State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

11/30/99

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

03-39-03-0016
Guardian Manufacturing
Gene E Lamoreaux
302 Conwell Ave.
Willard, OH 44890-9525

Dear Gene E Lamoreaux:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Northwest District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions or comments concerning this draft Title V permit, please contact Northwest District Office.

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA (electronic)
Jim Orlemann, DAPC Engineering
Michael Ahern, DAPC PMU
Northwest District Office
Michigan

Ohio EPA
State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 11/30/99

Effective Date:

Expiration Date:

The duration of this permit will be five years.

This document constitutes issuance to:

Guardian Manufacturing
302 Conwell Ave.
Willard, OH 44890-9525

of a Title V permit for Facility ID: 03-39-03-0016

Emissions Unit ID (Company ID)/
Emissions Unit Activity Description:
P001 (Large Dip Ring #1)
Glove dipping process with two dip tanks and 18 tray capacity

P002 (Small Dip Ring #3)
Glove dipping process with two dip tanks and 4 tray capacity

P004 (Large Dip Ring #2)
Glove dipping process with two dip tanks and 18 tray capacity

P005 (Form Release Dip Tank)
Mold release dipping process with one dip tank filled with a solution of a soap dissolved in denatured alcohol.

P007 (Large Cure Oven)
One large room with seven zones for progressively higher temperatures

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419) 352-8461

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

   i. The date, place (as defined in the permit), and time of sampling or measurements.
   ii. The date(s) analyses were performed.
   iii. The company or entity that performed the analyses.
   iv. The analytical techniques or methods used.
   v. The results of such analyses.
   vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

   i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
   ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.6 below if no deviations occurred during the quarter.
   iii. Written reports, which identify any deviations from the federally enforceable <u>monitoring</u>, <u>recordkeeping</u>, <u>and reporting requirements</u> contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
   iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"); and, pursuant to 40 CFR 68.215(a), the permittee shall submit either of the following:

a. a compliance plan for meeting the requirements of 40 CFR Part 68 by the date specified in 40 CFR 68.10(a) and OAC 3745-104-05(A); or

b. as part of the compliance certification submitted under 40 CFR 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 CFR Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

   i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
   ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
   iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
   iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be

submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency and to the Administrator of U.S. EPA in the following manner in the following manner and with the following content:

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
ii. Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.
(b) The permittee's current compliance status.
(c) Whether compliance was continuous or intermittent.
(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

16. Off Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;

b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

18. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

B. State Only Enforceable Section

1. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

4. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

5. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

6. Additional Reporting Requirements When There Are No Deviations of <u>Federally Enforceable</u> Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

large banbury (P003); churn #1 (Z002); churn #2 (Z003); dispense tank #1 (Z004); dispense tank #2 (Z005); dispense tank #3 (Z006); dispense tank #4 (Z007); dispense tank #5 (Z008); dispense tank #6 (Z009); mini lab (Z010); glove tumble dryer ovens (Z016); boiler #1 (B001); boiler #2 (B002); boiler #3 (B003); boiler #4 (B004); xylene storage tank (T001); toluene storage tank (T002); mixed solvent storage tank (Z001); QC/R&D lab (Z011); mini lab large cure oven (Z012); mini lab small cure oven (Z013); mini lab small cure oven (Z014); a room with heated air circulation for drying trays of gloves (P006); and mini lab small cure oven (Z015).

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations as well as any emission limitations and/or control requirements contained within a PTI for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Large Dip Ring #1 (P001)

Activity Description: Glove dipping process with two dip tanks and 18 tray capacity

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
large dip ring #1 for butyl rubber gloves, with carbon adsorption solvent recovery system	OAC rule 3745-21-07(G)(2)	Refer to section A.I.2.a of the terms and conditions of this permit.

2. Additional Terms and Conditions

2.a The organic compound (OC) emissions from this emissions unit shall be reduced by at least 85 percent (by weight) prior to being discharged into the ambient air. All OC emissions from the dipping process and the drying of the gloves (including drying in an oven) shall be vented to the carbon adsorption system.

II. Operational Restrictions

1. The permittee shall employ a permanent total enclosure around this emissions unit. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential (inches of water) established during the most recent emission test that demonstrated the emissions unit was in compliance, whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall install, maintain and operate monitoring devices and recorders which simultaneously measure and record the pressure inside and outside the permanent total enclosure for this emissions unit. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record on a daily basis the difference in pressure between the permanent total enclosure and the surrounding area(s).

2. The permittee shall operate and maintain a continuous organic monitoring device and recorder which measures and records the OC concentrations at the inlet to the carbon adsorbers and in the exhaust gases from the carbon adsorbers, and the flow rate of exhaust gases from the carbon adsorbers when the emissions unit is in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall record and maintain each hour the following information for emissions units P001, P002 and P004 combined:

a. the OC concentration in the gases at the inlet to the carbon adsorber, in ppm;

b. the OC concentration in the exhaust gases from the carbon adsorber, in ppm;

c. the flow rate of the exhaust gases from the carbon adsorber, in acf and scf/hour:

d. the OC removal efficiency of the carbon adsorption system [((3.a - 3.b)/3.a) x 100%]; and

e. the OC emission rate, in pounds.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries for this emissions unit which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when this emissions unit was in operation.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all hourly records showing that the requirement to reduce the OC emissions by at least 85% (by weight) was not met.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing on the carbon adsorption solvent recovery system which serves emissions units P001, P002 and P004 in accordance with the following requirements:

1.a The emission testing shall be conducted within 6 months of the issuance of this permit and every 2.5 years thereafter.

1.b The emission testing shall be conducted to demonstrate compliance with the overall control efficiency for OC (by weight) and the lbs OC/hour limitation specified in section B.I.1. of this permit.

1.c The following test method(s) shall be employed to demonstrate compliance with the overall control efficiency for OC, which will be determined as the product of the capture efficiency and the removal efficiency of the carbon adsorption system: The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

1.d The test(s) shall be conducted while emissions units P001, P002, and P004 are operating at or near the maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

V. Testing Requirements (continued)

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

3. Compliance Methods Requirements: Compliance with the emission limitation(s) established in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

Emission Limitation:
85% overall control efficiency for OC

Applicable Compliance Method:
The permittee shall demonstrate compliance with the limitation above based on the results of the emission testing required in sections A.V.1 and A.V.2 and the record keeping required in section A.III of the terms and conditions of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
large dip ring #1 for butyl rubber gloves, with carbon adsorption solvent recovery system	OAC rule 3745-31-05 (PTI No. 03-11424)	from the dipping and drying operations (for emissions units P001, P002 and P004 combined): 9.2 pounds organic compounds (OC)/hour 40.3 tons OC/year

2. Additional Terms and Conditions

2.a All OC emissions from the dipping and drying operations for this emissions shall be captured and vented to the carbon adsorption solvent recovery system. The carbon adsorption solvent recovery system shall have a 100 percent capture efficiency and a minimum removal efficiency of 96 percent for OC.

2.b The hourly and annual OC emission limitations above include the emissions from the drying operations (when the gloves are dried in the dip rooms and when the gloves are dried in the separate dry oven) since all drying occurs in less than 12 hours.

II. Operational Restrictions

1. This permit allows the use of materials specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxics Policy" and are based on both the materials used and the design parameters of the emissions units' exhaust systems, as specified in the application. Ohio EPA's "Air Toxics Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for each pollutant for emissions units P001, P002, P004, P006 and P007 combined:

Pollutant: xylene
TLV (ug/m3): 434,000
Maximum hourly emission rate (lbs/hr): 16.31
Predicted 1-hour maximum ground-level concentration at the fenceline (ug/m3): 1,425.0
Maximum acceptable ground-level concentration (MAGLC)(ug/m3): 10,333.3

Pollutant: toluene
TLV (ug/m3): 377,000
Maximum hourly emission rate (lbs/hr): 6.52
Predicted 1-hour maximum ground-level concentration at the fenceline (ug/m3): 569.9
Maximum acceptable ground-level concentration (MAGLC)(ug/m3): 8,976.2

II. Operational Restrictions (continued)

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to any of the afore-mentioned processes may be determined to be a "modification":

2.a changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

2.b changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

2.c changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

2.d changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

3. Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

3.a the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

3.b the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

3.c prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each change of this emissions unit where the air toxic modeling was required pursuant to the Air Toxic Policy:

1.a background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

1.b a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

IV. Reporting Requirements

1. The permittee shall submit annual reports which summarize the actual annual emissions from this emissions unit. These reports shall be submitted by January 31 of each and shall cover the previous calendar year.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the hourly OC limitation of 9.2 pounds.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all hourly records showing that the requirement to reduce the OC emissions by at least 96% (by weight) was not met.

V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) established in section B.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
9.2 pounds OC/hour (from emissions units P001, P002 and P004 combined)

Applicable Compliance Method:
The permittee shall demonstrate compliance with the limitation above based on the results of the emission testing required in sections A.V.1 and A.V.2 and the record keeping required in section A.III of the terms and conditions of this permit.

1.b Emission Limitation:
40.3 tons OC/year (from emissions units P001, P002 and P004 combined)

Applicable Compliance Method:
The tons/year emission limitation was developed by multiplying the pounds/hour limitation by 8,760 and dividing by 2000. Therefore, provided compliance is shown with the hourly OC limitation, compliance will also be shown with the annual OC limitation.

1.c Emission Limitation:
96% overall control efficiency for OC

Applicable Compliance Method:
The permittee shall demonstrate compliance with the limitation above based on the results of the emission testing required in sections A.V.1 and A.V.2 and the record keeping required in section A.III of the terms and conditions of this permit.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Small Dip Ring #3 (P002)

Activity Description: Glove dipping process with two dip tanks and 4 tray capacity

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
small dip ring #3 for butyl rubber gloves, with carbon adsorption solvent recovery system	OAC rule 3745-21-07(G)(2)	Refer to section A.I.2.a of the terms and conditions of this permit.

2. Additional Terms and Conditions

2.a The organic compound (OC) emissions from this emissions unit shall be reduced by at least 85 percent (by weight) prior to being discharged into the ambient air. All OC emissions from the dipping process and the drying of the gloves (including drying in an oven) shall be vented to the carbon adsorption system.

II. Operational Restrictions

1. The permittee shall employ a permanent total enclosure around this emissions unit. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential (inches of water) established during the most recent emission test that demonstrated the emissions unit was in compliance, whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall install, maintain and operate monitoring devices and recorders which simultaneously measure and record the pressure inside and outside the permanent total enclosure for this emissions unit. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record on a daily basis the difference in pressure between the permanent total enclosure and the surrounding area(s).

2. The permittee shall operate and maintain a continuous organic monitoring device and recorder which measures and records the OC concentrations at the inlet to the carbon adsorbers and in the exhaust gases from the carbon adsorbers, and the flow rate of exhaust gases from the carbon adsorbers when the emissions unit is in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall record and maintain each hour the following information for emissions units P001, P002 and P004 combined:

a. the OC concentration in the gases at the inlet to the carbon adsorber, in ppm;

b. the OC concentration in the exhaust gases from the carbon adsorber, in ppm;

c. the flow rate of the exhaust gases from the carbon adsorber, in acf and scf/hour, calculated as follows:

d. the OC removal efficiency of the carbon adsorption system [((3.a - 3.b)/3.a) x 100%]; and

e. the OC emission rate, in pounds.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries for this emissions unit which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when this emissions unit was in operation.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all hourly records showing that the requirement to reduce the OC emissions by at least 85% (by weight) was not met.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing on the carbon adsorption solvent recovery system which serves emissions units P001, P002 and P004 in accordance with the following requirements:

1.a The emission testing shall be conducted within 6 months of the issuance of this permit and every 2.5 years thereafter.

1.b The emission testing shall be conducted to demonstrate compliance with the overall control efficiency for OC (by weight) and the lbs OC/hour limitation specified in section B.I.1. of this permit.

1.c The following test method(s) shall be employed to demonstrate compliance with the overall control efficiency for OC, which will be determined as the product of the capture efficiency and the removal efficiency of the carbon adsorption system: The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

1.d The test(s) shall be conducted while emissions units P001, P002, and P004 are operating at or near the maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

V. Testing Requirements (continued)

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

3. Compliance Methods Requirements: Compliance with the emission limitation(s) established in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

Emission Limitation:
85% overall control efficiency for OC

Applicable Compliance Method:
The permittee shall demonstrate compliance with the limitation above based on the results of the emission testing required in sections A.V.1 and A.V.2 and the record keeping required in section A.III of the terms and conditions of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
small dip ring #3 for butyl rubber gloves, with carbon adsorption solvent recovery system	OAC rule 3745-31-05 (PTI No. 03-11424)	from the dipping and drying operations (for emissions units P001, P002 and P004 combined): 9.2 pounds organic compounds (OC)/hour 40.3 tons OC/year

2. Additional Terms and Conditions

2.a All OC emissions from the dipping and drying operations for this emissions shall be captured and vented to the carbon adsorption solvent recovery system. The carbon adsorption solvent recovery system shall have a 100 percent capture efficiency and a minimum removal efficiency of 96 percent for OC.

2.b The hourly and annual OC emission limitations above include the emissions from the drying operations (when the gloves are dried in the dip rooms and when the gloves are dried in the separate dry oven) since all drying occurs in less than 12 hours.

II. Operational Restrictions

1. This permit allows the use of materials specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxics Policy" and are based on both the materials used and the design parameters of the emissions units' exhaust systems, as specified in the application. Ohio EPA's "Air Toxics Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for each pollutant for emissions units P001, P002, P004, P006 and P007 combined:

Pollutant: xylene
TLV (ug/m3): 434,000
Maximum hourly emission rate (lbs/hr): 16.31
Predicted 1-hour maximum ground-level concentration at the fenceline (ug/m3): 1,425.0
Maximum acceptable ground-level concentration (MAGLC)(ug/m3): 10,333.3

Pollutant: toluene
TLV (ug/m3): 377,000
Maximum hourly emission rate (lbs/hr): 6.52
Predicted 1-hour maximum ground-level concentration at the fenceline (ug/m3): 569.9
Maximum acceptable ground-level concentration (MAGLC)(ug/m3): 8,976.2

II. Operational Restrictions (continued)

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to any of the afore-mentioned processes may be determined to be a "modification":

2.a changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

2.b changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

2.c changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

2.d changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

3. Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

3.a the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

3.b the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

3.c prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each change of this emissions unit where the air toxic modeling was required pursuant to the Air Toxic Policy:

1.a background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

1.b a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

IV. Reporting Requirements

1. The permittee shall submit annual reports which summarize the actual annual emissions from this emissions unit. These reports shall be submitted by January 31 of each and shall cover the previous calendar year.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the hourly OC limitation of 9.2 pounds.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all hourly records showing that the requirement to reduce the OC emissions by at least 96% (by weight) was not met.

V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) established in section B.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
9.2 pounds OC/hour (from emissions units P001, P002 and P004 combined)

Applicable Compliance Method:
The permittee shall demonstrate compliance with the limitation above based on the results of the emission testing required in sections A.V.1 and A.V.2 and the record keeping required in section A.III of the terms and conditions of this permit.

1.b Emission Limitation:
40.3 tons OC/year (from emissions units P001, P002 and P004 combined)

Applicable Compliance Method:
The tons/year emission limitation was developed by multiplying the pounds/hour limitation by 8,760 and dividing by 2000. Therefore, provided compliance is shown with the hourly OC limitation, compliance will also be shown with the annual OC limitation.

1.c Emission Limitation:
96% overall control efficiency for OC

Applicable Compliance Method:
The permittee shall demonstrate compliance with the limitation above based on the results of the emission testing required in sections A.V.1 and A.V.2 and the record keeping required in section A.III of the terms and conditions of this permit.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Large Dip Ring #2 (P004)

Activity Description: Glove dipping process with two dip tanks and 18 tray capacity

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
large dip ring #2 for butyl rubber gloves, with carbon adsorption solvent recovery system	OAC rule 3745-21-07(G)(2)	Refer to section A.I.2.a of the terms and conditions of this permit.

2. Additional Terms and Conditions

2.a The organic compound (OC) emissions from this emissions unit shall be reduced by at least 85 percent (by weight) prior to being discharged into the ambient air. All OC emissions from the dipping process and the drying of the gloves (including drying in an oven) shall be vented to the carbon adsorption system.

II. Operational Restrictions

1. The permittee shall employ a permanent total enclosure around this emissions unit. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential (inches of water) established during the most recent emission test that demonstrated the emissions unit was in compliance, whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall install, maintain and operate monitoring devices and recorders which simultaneously measure and record the pressure inside and outside the permanent total enclosure for this emissions unit. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record on a daily basis the difference in pressure between the permanent total enclosure and the surrounding area(s).

2. The permittee shall operate and maintain a continuous organic monitoring device and recorder which measures and records the OC concentrations at the inlet to the carbon adsorbers and in the exhaust gases from the carbon adsorbers, and the flow rate of exhaust gases from the carbon adsorbers when the emissions unit is in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall record and maintain each hour the following information for emissions units P001, P002 and P004 combined:

a. the OC concentration in the gases at the inlet to the carbon adsorber, in ppm;

b. the OC concentration in the exhaust gases from the carbon adsorber, in ppm;

c. the flow rate of the exhaust gases from the carbon adsorber, in acf and scf/hour, calculated as follows:

d. the OC removal efficiency of the carbon adsorption system [((3.a - 3.b)/3.a) x 100%]; and

e. the OC emission rate, in pounds.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries for this emissions unit which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when this emissions unit was in operation.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all hourly records showing that the requirement to reduce the OC emissions by at least 85% (by weight) was not met.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing on the carbon adsorption solvent recovery system which serves emissions units P001, P002 and P004 in accordance with the following requirements:

1.a The emission testing shall be conducted within 6 months of the issuance of this permit and every 2.5 years thereafter.

1.b The emission testing shall be conducted to demonstrate compliance with the overall control efficiency for OC (by weight) and the lbs OC/hour limitation specified in section B.I.1. of this permit.

1.c The following test method(s) shall be employed to demonstrate compliance with the overall control efficiency for OC, which will be determined as the product of the capture efficiency and the removal efficiency of the carbon adsorption system: The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

1.d The test(s) shall be conducted while emissions units P001, P002, and P004 are operating at or near the maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

V. Testing Requirements (continued)

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

3. Compliance Methods Requirements: Compliance with the emission limitation(s) established in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

Emission Limitation:
85% overall control efficiency for OC

Applicable Compliance Method:
The permittee shall demonstrate compliance with the limitation above based on the results of the emission testing required in sections A.V.1 and A.V.2 and the record keeping required in section A.III of the terms and conditions of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
large dip ring #2 for butyl rubber gloves, with carbon adsorption solvent recovery system	OAC rule 3745-31-05 (PTI No. 03-11424)	from the dipping and drying operations (for emissions units P001, P002 and P004 combined): 9.2 pounds organic compounds (OC)/hour 40.3 tons OC/year

2. Additional Terms and Conditions

2.a All OC emissions from the dipping and drying operations for this emissions shall be captured and vented to the carbon adsorption solvent recovery system. The carbon adsorption solvent recovery system shall have a 100 percent capture efficiency and a minimum removal efficiency of 96 percent for OC.

2.b The hourly and annual OC emission limitations above include the emissions from the drying operations (when the gloves are dried in the dip rooms and when the gloves are dried in the separate dry oven) since all drying occurs in less than 12 hours.

II. Operational Restrictions

1. This permit allows the use of materials specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxics Policy" and are based on both the materials used and the design parameters of the emissions units' exhaust systems, as specified in the application. Ohio EPA's "Air Toxics Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for each pollutant for emissions units P001, P002, P004, P006 and P007 combined:

Pollutant: xylene
TLV (ug/m3): 434,000
Maximum hourly emission rate (lbs/hr): 16.31
Predicted 1-hour maximum ground-level concentration at the fenceline (ug/m3): 1,425.0
Maximum acceptable ground-level concentration (MAGLC)(ug/m3): 10,333.3

Pollutant: toluene
TLV (ug/m3): 377,000
Maximum hourly emission rate (lbs/hr): 6.52
Predicted 1-hour maximum ground-level concentration at the fenceline (ug/m3): 569.9
Maximum acceptable ground-level concentration (MAGLC)(ug/m3): 8,976.2

II. Operational Restrictions (continued)

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to any of the afore-mentioned processes may be determined to be a "modification":

2.a changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

2.b changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

2.c changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

2.d changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

3. Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

3.a the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

3.b the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

3.c prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each change of this emissions unit where the air toxic modeling was required pursuant to the Air Toxic Policy:

1.a background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

1.b a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

IV. Reporting Requirements

1. The permittee shall submit annual reports which summarize the actual annual emissions from this emissions unit. These reports shall be submitted by January 31 of each and shall cover the previous calendar year.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the hourly OC limitation of 9.2 pounds.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all hourly records showing that the requirement to reduce the OC emissions by at least 96% (by weight) was not met.

V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) established in section B.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
9.2 pounds OC/hour (from emissions units P001, P002 and P004 combined)

Applicable Compliance Method:
The permittee shall demonstrate compliance with the limitation above based on the results of the emission testing required in sections A.V.1 and A.V.2 and the record keeping required in section A.III of the terms and conditions of this permit.

1.b Emission Limitation:
40.3 tons OC/year (from emissions units P001, P002 and P004 combined)

Applicable Compliance Method:
The tons/year emission limitation was developed by multiplying the pounds/hour limitation by 8,760 and dividing by 2000. Therefore, provided compliance is shown with the hourly OC limitation, compliance will also be shown with the annual OC limitation.

1.c Emission Limitation:
96% overall control efficiency for OC

Applicable Compliance Method:
The permittee shall demonstrate compliance with the limitation above based on the results of the emission testing required in sections A.V.1 and A.V.2 and the record keeping required in section A.III of the terms and conditions of this permit.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Form Release Dip Tank (P005)

Activity Description: Mold release dipping process with one dip tank filled with a solution of a soap dissolved in denatured alcohol.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
form release dip tank	OAC rule 3745-21-07(G)	none (refer to section A.II.1 of the terms and conditions of this permit)

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall not employ any material in this emissions unit which is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following information each month for this emissions unit:

a. the company identification for each material employed.

b. documentation on whether or not each material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify each month during which a photochemically reactive material was employed. The report shall be submitted within 45 days after the deviation occurs.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
form release dip tank	OAC rule 3745-31-05 (PTI No. 03-11424)	114.5 pounds organic compounds (OC)/hour (refer to section B.I.2.a of the terms and conditions of this permit) 40.0 tons OC/year (refer to section B.I.2.b of the terms and conditions of this permit)

2. Additional Terms and Conditions

2.a The 114.5 pounds OC/hour emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

2.b The emissions of OC from this emissions unit shall not exceed 40.0 tons per year, based upon a rolling, 12-month summation of the monthly OC input rates*.

* The total monthly OC input rate is equivalent to the total monthly OC emission rate and is based upon 100 percent of the solvent in the materials being emitted.

II. Operational Restrictions

1. This permit allows the use of materials specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions units' exhaust systems, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for each pollutant for this emissions unit:

Pollutant: ethanol
TLV (ug/m3): 1,880,000
Maximum hourly emission rate (lbs/hr) {increase only}: 102.0
Predicted 1-hour maximum ground-level concentration at the fenceline (ug/m3): 11,210
Maximum acceptable ground-level concentration (MAGLC)(ug/m3): 44,762

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to any of the afore-mentioned processes may be determined to be a "modification":

II. Operational Restrictions (continued)

2.a changes in the composition of the materials used coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

2.b changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

2.c changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

2.d changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

3. Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

3.a the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

3.b the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

3.c prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:

a. the number of trays coated;

b. the OC input rate (alcohol usage), in pounds, calculated as follows:

OC input rate (pounds/month) = [the number of trays coated (from section 1.a above) x 9.54 pounds OC/tray*]; and

c. the rolling, 12-month summation of the monthly OC input rates, in tons.

* This emission factor is supplied by the permittee and was based on material balance calculations included in PTI application number 03-11424.

2. The permittee shall collect and record the following information for each change of this emissions unit where the air toxic modeling was required pursuant to the Air Toxic Policy:

2.a background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

2.b a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation for OC emissions.

IV. Reporting Requirements (continued)

2. The permittee shall submit annual reports which summarize the actual annual OC emissions for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) in section B.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

1.a Emission Limitation:
114.5 pounds OC/hour

Applicable Compliance Method:
The permittee shall demonstrate compliance with the emission limitation above by multiplying the maximum material usage (17.4 gallons/hour) by the maximum OC content of all the materials employed.

1.b Emission Limitation:
40.0 tons OC/year, based upon a rolling, 12-month period

Applicable Compliance Method:
Compliance shall be determined in accordance with the record keeping required in section B.III.1 of the terms and conditions of this permit.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Large Cure Oven (P007)

Activity Description: One large room with seven zones for progressively higher temperatures

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
cure oven #1	OAC rule 3745-21-07(G)(1)	3.0 pounds organic compounds (OC)/hour 15.0 pounds OC/day

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. In order to comply with the limitation established in OAC rule 3745-21-07(G)(1), the permittee shall limit the quantity of gloves cured each day in this emissions unit to less than or equal to 606 pounds of dry gloves.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

a. the type of glove cured (i.e., 7 mil butyl, 14 mil butyl, 25 mil butyl, 35 mil butyl or 35 mil neoprene);

b. the number of trays of gloves cured/batch;

c. the number of gloves/tray;

d. the dry weight of each glove, in pounds;

e. the total dry weight of all the gloves cured/batch [b x c x d], in pounds;

f. the OC emissions, in pounds/batch, calculated as follows:

OC emissions (pounds/batch) = [(13 x G)/525]*

where:

G = the amount of dried gloves (from section 1.e above), in pounds;

g. the number of hours the emissions unit was in operation (curing)/batch;

h. the average hourly OC emission rate (f/g), in pounds/hour (average);

i. the number of batches cured;

j. the OC emission rate [f x i], in pounds; and

k. the total amount of gloves dried [e x i], in pounds.

*The permittee has provided test data which showed that the OC emissions from the cure oven (when drying 525 pounds of 25 mil butyl gloves) is 13 pounds/batch. The permittee has also indicated that the OC emissions are directly proportional to the dry glove weight.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:

a. an identification of each day during which the organic compound emissions exceeded 3.0 pounds per hour (average), and the actual organic compound emissions for each such hour (average);

b. an identification of each day during which the organic compound emissions exceeded 15 pounds per day, and the actual organic compound emissions for each such day; and

c. an identification of each day during which the amount of gloves dried exceeded 606 pounds per day, and the actual amount of gloves dried for each such day.

V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) established in the section A.1 of the terms and conditions of this permit shall be determined in accordance with the following method(s):

1.a Emission Limitations:
3.0 pounds OC/hour
15.0 pounds OC/day

Applicable Compliance Method:
Compliance shall be determined in accordance with the record keeping required in section A.III.1 of the terms and conditions of this permit.

V. Testing Requirements (continued)

1.b Production Restriction:
606 pounds/day dry gloves

Applicable Compliance Method:
Compliance shall be determined in accordance with the record keeping required in section A.III.1 of the terms and conditions of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
cure oven #1	OAC rule 3745-31-05 (PTI No. 03-11424)	2.74 tons organic compounds (OC)/year

2. Additional Terms and Conditions

2.a The 2.74 tons OC/year emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

1. This permit allows the use of materials specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions units' exhaust systems, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for each pollutant for each emissions unit P001, P002, P004, P006 and P007 combined (it was assumed that if all of the units combined passed modeling that each individual unit would therefore pass modeling):

Pollutant: xylene
TLV (ug/m3): 434,000
Maximum hourly emission rate (lbs/hr): 16.31
Predicted 1-hour maximum ground-level concentration at the fenceline (ug/m3): 1,425.0
Maximum acceptable ground-level concentration (MAGLC)(ug/m3): 10,333.3

Pollutant: toluene
TLV (ug/m3): 377,000
Maximum hourly emission rate (lbs/hr): 6.52
Predicted 1-hour maximum ground-level concentration at the fenceline (ug/m3): 569.9
Maximum acceptable ground-level concentration (MAGLC)(ug/m3): 8,976.2

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to any of the afore-mentioned processes may be determined to be a "modification":

2.a changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

II. Operational Restrictions (continued)

2.b changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

2.c changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

2.d changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

3. Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

3.a the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

3.b the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

3.c prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each change of emissions units P001, P002, P004, P005, P006 and P007 where the air toxic modeling was required pursuant to the Air Toxic Policy

a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

IV. Reporting Requirements

1. The permittee shall submit annual reports which summarize the actual annual OC emissions for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) established in the section B.1 of the terms and conditions of this permit shall be determined in accordance with the following method(s):

Emission Limitation:
2.47 tons/year

Applicable Compliance Method:
The tons/year emission limitation was developed by multiplying the 15 pounds/day OC limitation from section A.I.1 by 365 and dividing by 2000. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

VI. Miscellaneous Requirements

None

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